

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ERIK SHEEHAN,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC., LAURA
CARDINALE, LISA DAMASK, CAROLYN DRISCOLL,
PAUL McGOVERN, LINDA RICHELSON, DOREEN
TOBEN and DOUG WILDER,

Defendants.

04 12364 JLT

Civil Action No.

AFFIDAVIT OF LINDA RICHELSON

I, Linda Richelson, do hereby depose and state the following:

1. I am of legal age, have personal knowledge of the matters set forth herein and would be competent to testify about the information contained in this Affidavit.
2. My employment with Verizon Communications, Inc. ("Verizon") ended in November, 2002.
3. Upon information and belief, Erik Sheehan ("Sheehan") filed a Charge of Discrimination ("Charge") with the Massachusetts Commission Against Discrimination ("MCAD") against Verizon on November 6, 2002.
4. I was not aware of the Charge, and had no opportunity to review or respond to it.
5. Upon information and belief, while the Charge identifies me, it does not name me individually as a Respondent.
6. To the present date, I have not been served with nor have I been given the opportunity to respond to the Charge at the MCAD.
7. To my knowledge, no other Charge of Discrimination was filed against me individually within the 300 days permitted by Mass. Gen. Laws ch. 151B, § 5. No such Charge has ever been served upon me.

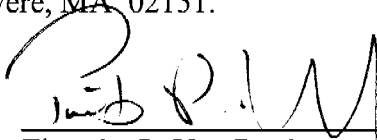
SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 5 OF NOVEMBER, 2004.



Linda Richelson

CERTIFICATE OF SERVICE

I, Timothy P. Van Dyck, hereby certify that on this 8th day of November, 2004, I caused a copy of the foregoing document to be mailed via first-class mail, to Domenic Finelli, Esq., Barrister Hall, 199 Revere Street, Revere, MA 02151.



Timothy P. Van Dyck